

FILED

January 26, 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: CR
DEPUTY

REDACTED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

UNITED STATES OF AMERICA

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SEALED

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§

CAUSE NO.: DR21-CR-00907-AM

v.

§

§

SUPERSEDING INDICTMENT

§

YUSSEFF SAID NAHLE-PEREZ,
ALVARO PEREZ JR.

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[VIO: COUNT ONE: 8 U.S.C. §
1324(a)(1)(A)(v)(I) & (B)(i) Conspiracy
to Transport Illegal Aliens; COUNT
TWO: 8 U.S.C. § 1324(a)(1)(A)(ii) &
(B)(i) Illegal Alien Transportation;
COUNT THREE: 8 U.S.C. §
1324(a)(1)(A)(ii) & (B)(i) Illegal Alien
Transportation.]

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THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

Between on or about June 29, 2020 and on or about May 11, 2021, in the Western
District of Texas, Defendants,

YUSSEFF SAID NAHLE-PEREZ,
ALVARO PEREZ JR.,

did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in

furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (B)(i).

COUNT TWO

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about May 11, 2021, in the Western District of Texas, Defendants,

YUSSEFF SAID NAHLE-PEREZ,
ALVARO PEREZ JR.,

did knowingly and in reckless disregard of the fact that the hereinafter named alien has come to, entered and remained in the United States in violation of law, willfully and unlawfully transported and moved, and attempted to transport and move, by means of transportation or otherwise, in furtherance of such violation of law, a certain alien, to-wit: VANESA VASQUEZ-BARRERA, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT THREE

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about June 29, 2020, in the Western District of Texas, Defendants,

YUSSEFF SAID NAHLE-PEREZ,
ALVARO PEREZ JR.,

did knowingly and in reckless disregard of the fact that the hereinafter named alien has come to, entered and remained in the United States in violation of law, willfully and unlawfully transported and moved, and attempted to transport and move, by means of transportation or otherwise, in furtherance of such violation of law, a certain alien, to-wit: CRUZ FLORES-GASPAR, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See FED. R. CRIM. P. 32.2]

I.

Immigration Violations and Forfeiture Statute
[Title 8 U.S.C. §§ 1324(a)(1)(A)(v)(I)/(ii) & (B)(i)),
subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(6)]

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of property, including any items listed below, upon conviction and as a part of sentence pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 982(a)(6) which states the following:

Title 18 U.S.C. § 982 Criminal forfeiture

(a)(6)(A) The court, in imposing sentence on a person convicted of a violation of, or conspiracy to violate, section 274(a) . . . of the Immigration and Nationality Act . . . shall order that the person forfeit to the United States, regardless of any provision of State law—

- (i) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and
- (ii) any property real or personal—
 - (I) that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; or
 - (II) that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.


This Notice of Demand for Forfeiture includes but is not limited to the following properties.

1. **Glock, 9mm handgun, s/n: ADRZ1458;**
2. **9mm magazine;**
3. **Nine 9mm rounds of ammunition; and**
4. **Any other related ammunition and firearm accessories.**

A TRUE BILL


FOREPERSON

ASHLEY C. HOFF
United States Attorney

By:  Fer
BRETT C. MINER
Assistant United States Attorney